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Received & Inspected

APR 23 2018

FCC Mailroom

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: GN Docket No. 17-183, Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz
Ex Parte Communication

Dear Ms. Dortch:

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Yuma Regional Communication System (YRCS) is a consortium made up of multiple public safety agencies in Yuma and La Paz County in Arizona. We operate a regional public safety grade wide area P25 700MHz trunked radio system that provides service to the area's public safety first responders made up of local, state, federal and tribal law agencies for both operability and interoperability. Additionally it operates a regional public safety Computer Aided Dispatch / Records Management System / Jail Management Sytem (CAD/RMS/JMS) for law enforcement and fire/ems that provides data sharing for officer safety. Both the radio network and the CAD/RMS/JMS are interconnected through microwave radio links consisting of 6 and 18GHz of the public safety band allocation. The radio links are essential to YRCS users that rely on both systems for officer safety.

We are writing to you to express our opposition to the proposals contained in ex parte "Frequency Sharing for Radio Local Area Networks in the 6 GHz Band (January 2018)," prepared by RKF Engineering Services, LLC on behalf of Apple Inc., Broadcom Limited, Cisco Systems, Inc., Facebook Inc., Google LLC, Hewlett-Packard Enterprise, Intel Corporation, Microsoft Corporation, MediaTek Inc., and QUALCOMM Incorporated.

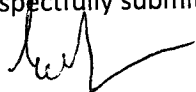
We agree wholeheartedly with the opposition comments made by AT&T and the FWCC (Fixed Wireless Communications Coalition). The 6GHz band is the work horse of the fixed link world of public safety in the United States. Its properties are unique; no other band can support such long links required by the public safety community at such high availability. 7GHz and 8GHz are reserved for federal use and 10GHz only supports up to 5MHz channels. The importance of the role of 6GHz, therefore, cannot be overestimated. 6GHz provides critical communications to support both public safety and national infrastructure. AT&T's ex parte of March 16th points out that the band is home to almost 100,000 microwave links. We alone operate eight links in our area and through our partnerships with Arizona Department of Public Safety use multiples of theirs to carry YRCS traffic. At a relatively conservative estimate of \$125,000 per link for CapEx, \$1M is invested in the 6GHz band alone by YRCS. The value of the work completed by these links on a daily basis, over a matter of years, is more difficult to estimate but likely goes well beyond the value of the hardware installed, especially given the number of public safety agencies that rely on and use this band.

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Currently there are random times of interference due to Weapons Tactics Instruction (WTI) carried by our two local bases Marine Corps Air Station – Yuma and Yuma Proving Grounds. The potential interference of the proposed RLANs will generate officer safety concerns. The FWCC study filed on March 13th, 2018, discredited the study by RKF Engineering by showing its claimed results do not follow from its assumptions, and showed in detail that the RLANs considered by RKF in fact would cause widespread interference that cannot be afforded when it comes to public safety and first responders. In our opinion unlicensed/unregistered RLANs cannot coexist with licensed fixed links and we are greatly concerned that it would be virtually impossible for the FCC to locate any sources of interference in order to provide licensed fixed links and public safety with the protection they are entitled to.

Respectfully submitted



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